

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-v-

WILLIAM T. WALTERS  
a/k/a "Billy,"

*Defendant.*

**ECF CASE**

S1 16 CR. 338 (PKC)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the Declaration of Paul H. Schoeman, Esq., dated February 3, 2017, the exhibits attached thereto, and the accompanying Memorandum of Law, defendant William T. Walters, by his undersigned attorneys, will move this Court before the Honorable P. Kevin Castel, at the United States Courthouse, 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an Order precluding the government from introducing at trial purported "other acts" evidence pursuant to Federal Rule of Evidence 404(b).

Dated: New York, New York  
February 3, 2017

Respectfully submitted,

By: /s/ Barry H. Berke  
Barry H. Berke  
Paul H. Schoeman

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